

IN THE UNITED STATES BANKRUPTCY COURT
Middle District of Pennsylvania

In the Matter of:

Stubert Martin Turpie, Jr.
Marjorie Lee Turpie

Debtor(s)

: Case No. 1:22-bk-01453-HWV
: Chapter 7
:
:

MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

Pursuant to 11 U.S.C. § 706, the above-named Debtor(s) requests that this court enter an Order converting this case under Chapter 7 to a case under Chapter 13 of the Bankruptcy code (title 11 of the United States Code), on the grounds set forth below.

1. On August 6, 2021, the above-named Debtor(s) filed a Voluntary Petition under Chapter 7 of the Bankruptcy Code.
2. This case has not been previously converted under 11 U.S.C. § 1112, § 1208, or § 1307.

WHEREFORE, Debtor(s) prays for an Order converting this case under Chapter 7 to Chapter 13 of the Bankruptcy Code.

Date September 30, 2022

Signature /s/ Stubert Martin Turpie, Jr.
Stubert Martin Turpie, Jr.
Debtor

Date September 30, 2022

Signature /s/ Marjorie Lee Turpie
Marjorie Lee Turpie
Joint Debtor

Attorney /s/ Michael J. Csonka
Michael J. Csonka 91232

Csonka Law
166 South Main Street
Chambersburg, PA 17201
717-977-3171
Fax: 717491-1639
office@csonkalaw.com